## TREBICKA EX. B

## REDACTED VERSION OF DOCUMENT SOUGHT TO BE SEALED

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20	UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA	
21		
22	CHASOM BROWN, WILLIAM BYATT,	Case No. 5:20-cv-03664-LHK-SVK
23	JEREMY DAVIS, CHRISTOPHER CASTILLO, and MONIQUE TRUJILLO	DECLARATION OF JOHN A.
23	individually and on behalf of all other	YANCHUNIS IN SUPPORT OF
24	similarly situated,	PLAINTIFFS' MOTION TO
25	Plaintiffs,	COMPEL RE: P3
	,	
26	V.	
27	GOOGLE LLC,	
28	Defendant.	
_0		

## **DECLARATION OF JOHN A. YANCHUNIS**

I, John A. Yanchunis, declare as follows:

- 1. I am a partner with the law firm of Morgan & Morgan, P.A., counsel for Plaintiffs in this matter.
- 2. Pursuant to the Court's June 8, 2021 Order on May 26, 2021 Joint Discovery Submission, Dkt. 191, 191-1, I submit this Declaration providing foundation and a brief explanation of the attachments.
- 3. Exhibit 1: Google produced this document on April 14, 2021, Bates Labeled GOOG-BRWN-00028920. Google designated this document as Confidential.
- 4. Exhibit 2: Google produced this document on June 9, 2021, Bates Labeled GOOG-BRWN-00078395–99. Google designated this document as Highly Confidential Attorneys' Eyes Only.
- 5. Exhibit 3: This is Google's correspondence responding to Plaintiffs' questions concerning the production reflected in Exhibit 2, above. On June 9, 2021, Google produced what it purports to be Plaintiffs' unauthenticated data based on Plaintiffs' cookie values from private browsing sessions. On June 10, 2021, Plaintiffs met and conferred with Google to discuss the production. At Google's request, Plaintiffs put their inquiry in writing to Google on June 10, 2021. Google responded with this correspondence on June 15, 2021.
- 6. Exhibit 4: This is Plaintiffs' April 27, 2021, Notice of Deposition pursuant to Rule 30(b)(6).
- 7. Exhibit 5: This is the June 16, 2021, deposition transcript from Google's Rule 30(b)(6) designated corporate representative Dr. Glenn Berntson. Google designated this transcript as Confidential, and it contains documents that Google has designated as Confidential and Highly Confidential Attorneys' Eyes Only.

- 8. Exhibit 6: Google produced this document on April 9, 2021, Bates Labeled GOOG-BRWN-00026161. Google designated this document as Confidential. This is an internal Google design document for twice-baked cookies. At the Rule 30(b)(6) deposition, Dr. Berntson had never seen this document before and could not provide any testimony concerning the contents of this document.
- 9. Exhibit 7: This is an email exchange between the Parties' counsel concerning Plaintiffs' attempts to locate their twice-baked cookies, as well as the scope of cookies and identifiers that Plaintiffs requested from Google (including Google Analytics cookies, GID cookies, and any other cookies related to Google Analytics and Google Ad Manager).
- 10. Exhibit 8: Google produced this document on June 10, 2021, Bates Labeled GOOG-BRWN-00078435–38. Google designated this document as Highly Confidential Attorneys' Eyes Only.

. At the Rule 30(b)(6) deposition, Dr. Berntson could not provide any testimony concerning these logs.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 23d day of June, at Tampa, Florida.

/s/ John A. Yanchunis
John A. Yanchunis